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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC COMPANY,
Debtors.**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION ENLARGING TIME
FOR DANIEL DEGRADO AND
NORMA ANN DEGRADO TO FILE
PROOFS OF CLAIM**

[Related to Dkt. Nos. 9326-27]

Resolving Motion set for Hearing on
November 17, 2020 at 10:00 am PT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Daniel DeGrado and Norma Ann DeGrado (collectively, the “**Movants**”), on the other hand, by and through their respective counsel, hereby submit this stipulation (the “**Stipulation**”) for an order enlarging the time for Movants to file proofs of claim in the Chapter 11 Cases as set forth herein. The Reorganized Debtors and Movants are referred to in this Stipulation collectively as the “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter 11 Cases in the United States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

B. By Order dated July 1, 2019 [Docket No. 2806] (the “**Bar Date Order**”), the Bankruptcy Court set October 21, 2019 at 5:00 p.m. (Prevailing Pacific Time) (the “**Original Bar Date**”) as the deadline in these Chapter 11 Cases for filing proofs of claim in respect of any of prepetition claim (as defined in section 101(5) of the Bankruptcy Code) against either of the Debtors, including all claims of Fire Claimants,¹ Wildfire Subrogation Claimants, Governmental Units (as defined in section 101(27) of the Bankruptcy Code), and Customers, and for the avoidance of doubt, including all secured claims and priority claims.

C. On September 2, 2019, Timothy DeGrado filed Proof of Claim No. 8161 on behalf of himself and his parents, Daniel DeGrado and Norma Ann DeGrado (the “**Original Proof of Claim**”).

¹ Capitalized terms used but not otherwise herein defined have the meanings ascribed to such terms in the Bar Date Order or the Plan (as defined below), as applicable.

1 D. By Order dated November 11, 2019, the Bankruptcy Court extended the Bar Date
2 until December 31, 2019 at 5:00 p.m. (Prevailing Pacific Time), solely for the benefit of any non-
3 governmental Fire Claimants who had not filed proofs of claim by the Original Bar Date.

4 E. By Order dated June 20, 2020 [Dkt. No. 8053] the Bankruptcy Court confirmed the
5 *Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19,*
6 *2020* (as may be further modified, amended or supplemented from time to time, and together with
7 any exhibits or scheduled thereto, the "**Plan**"). The Effective Date of the Plan occurred on July 1,
8 2020. *See* Dkt. No. 8252.

9 F. On October 20, 2020, Movants filed the *Motion to Allow/Deem Timely Late Filing of*
10 *Proofs of Claim by Daniel DeGrado and Norma Ann DeGrado* [Dkt. No. 9326] (the "**Motion**"), in
11 which Movants assert they should be permitted to file late claims for damages allegedly sustained as
12 a result of the Camp Fire (the "**Asserted Fire Victim Claims**"). The Motion is set for hearing on
13 November 17, 2020 (the "**Hearing**"). *See* Dkt. No. 9327.

14 G. On October 18, 2020, Daniel DeGrado filed Proof of Claim No. 106601 and Norma
15 Ann DeGrado filed Proof of Claim No. 106600 on account of the Asserted Fire Victim Claims
16 (collectively, the "**Proofs of Claim**"). The Proofs of Claim amend the Original Proof of Claim.

17 H. Pursuant to the Plan, all Fire Victim Claims were channeled to the Fire Victim Trust
18 on the Effective Date and are subject to the Channeling Injunction, and any liabilities of the Debtors
19 or the Reorganized Debtors, as applicable, for any Fire Victim Claims have been fully assumed by,
20 and are the sole responsibility of, the Fire Victim Trust, and shall be satisfied solely from the assets
21 of the Fire Victim Trust. *See* Plan §§ 4.7(a), 4.26(c), 6.7(a).

22 I. The Reorganized Debtors have raised with Movants certain informal objections to the
23 relief requested in the Motion.

24 J. The Fire Victim Trustee has reviewed the Stipulation and, based on the facts
25 presented in the Motion, has no objection to the agreements set forth herein or to entry of an Order
26 approving the terms of the Stipulation.

27 K. The Parties hereto desire to resolve their issues regarding the Motion.
28

1 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
2 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
3 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
4 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**
5 **TO ORDER, THAT:**

6 1. The Proofs of Claim shall be deemed timely filed.

7 2. The Original Proof of Claim, the Proofs of Claim, and the Asserted Fire Victim
8 Claims shall for all purposes be treated and classified as Fire Victim Claims under the Plan, and shall
9 be fully assumed by, and the sole responsibility of, the Fire Victim Trust and subject to the
10 Channeling Injunction, to be administered, processed, settled, disallowed, resolved, liquidated,
11 satisfied, and/or paid in accordance with the Fire Victim Trust Agreement and the Fire Victim
12 Claims Resolution Procedures. Movants shall have no further recourse against the Debtors or
13 Reorganized Debtors, as applicable, with respect to the Original Proof of Claim, the Proofs of Claim,
14 or the Asserted Fire Victim Claims.

15 3. Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors
16 or the Reorganized Debtors, as applicable, the Fire Victim Trust, or any other party in interest of any
17 right to object to the Original Proof of Claim, the Asserted Fire Victim Claims, or the Proofs of
18 Claim on any grounds other than the untimely filing thereof.

19 4. Nothing herein is intended to, nor shall it be construed to be, a waiver by Movants of
20 their rights to assert any right in contravention to or in opposition of any asserted challenge to the
21 Original Proof of Claim, the Asserted Fire Victim Claims, or the Proofs of Claim.

22 5. Upon entry of an Order approving the terms of this Stipulation, the Motion shall be
23 deemed withdrawn with prejudice, and the Hearing vacated.

24 6. In the event that the terms of this Stipulation are not approved by the Bankruptcy
25 Court, it shall be null and void and have no force or effect and the Parties agree that, in such
26 circumstances, this Stipulation shall be of no evidentiary value whatsoever in any proceedings.

27 7. This Stipulation shall be binding on the Parties and each of their successors in
28 interest.

1 8. This Stipulation shall constitute the entire agreement and understanding of the Parties
2 relating to the subject matter hereof and supersede all prior agreements and understandings relating
3 to the subject matter hereof.

4 9. This Stipulation may be executed in counterparts, each of which shall be deemed an
5 original but all of which together shall constitute one and the same agreement.

6 10. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
7 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.

8
9 Dated: October 27, 2020

Dated: October 27, 2020

10 WEIL GOTSHAL & MANGES LLP

MARSHACK HAYS LLP

11
12 /s/ Matthew Goren
Matthew Goren, Esq.

/s/ Laila Masud
Laila Masud, Esq.

13 Attorneys for Debtors
14 and Reorganized Debtors

Attorneys for Daniel DeGrado and Norma Ann
DeGrado